

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
	)	
	)	
v.	)	Criminal Case No. 1:18-cr-457 (AJT)
	)	
BIJAN RAFIEKIAN	)	
and	)	
KAMIL EKIM ALPTEKIN	)	
_____	)	

**[PROPOSED] ORDER**

Upon consideration of non-party Kirsten Verderame's 17(c)(2) Motion to Quash, the memorandum in support, any opposition thereto, any reply in further support thereof, and the entire record herein, for good cause shown, it is this \_\_\_\_ day of \_\_\_\_\_, 2019 hereby

**ORDERED** that Ms. Verderame's 17(c)(2) Motion to Quash is **GRANTED**.

[alternatively]

**ORDERED** that Ms. Verderame's 17(c)(2) Motion to Quash is **GRANTED in part and DENIED in part** in that Ms. Verderame is ordered to produce materials in her possession created between July 2016 and March 2017 containing Defendant's statements, summaries of Defendant's statements, or statements about Defendant relevant to the FARA filing; it is further

**ORDERED** that Ms. Verderame shall submit to this Court, no later than April 2, 2019, a proposed Rule 502(d) order for this Court's consideration.

**SO ORDERED.**

\_\_\_\_\_  
The Honorable Anthony J. Trenga  
United States District Court Judge